

SUPREME JUDICIAL COURT OF MAINE

State of Maine v. Brandon Oakley McCoy

McCoy, 2026 ME 41 (Supreme Judicial Court of Maine 2026) · No. Yor-25-148 · Decided April 28, 2026

SUMMARY

The Maine Supreme Judicial Court held that Brandon Oakley McCoy could not be adjudicated for evading Maine registration fees and excise taxes because the pickup truck was owned and registered by an out-of-state LLC, and the record did not establish that McCoy was its owner under Maine law. The court distinguished that offense from operating an unregistered vehicle and concluded that the truck's Montana registration appeared to qualify for Maine's reciprocity exemption. The court vacated the judgment and remanded for entry of judgment for McCoy.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Hjelm, A.R.J.; Stanfill, C.J.; Connors, J.; Lawrence, J.; Douglas, J.
JURISDICTION	Maine Supreme Judicial Court
DECIDED	April 28, 2026
DOCKET	Yor-25-148
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from a District Court adjudication of a traffic infraction for evasion of registration fees and excise taxes under 29-A M.R.S. § 514.
STANDARD OF REVIEW	The court reviewed the statutory interpretation issue de novo. Because neither party requested findings of fact, it viewed the evidentiary record in the light most favorable to the State to determine whether the trier of fact could have found each element by a preponderance of the evidence.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Judicial Court of Maine
PARTIES	Brandon Oakley McCoy v. State of Maine

TOPICS

- statutory interpretation
- plain meaning rule
- appellate procedure
- limited liability companies
- corporate veil piercing

PRACTICE AREAS

Maine motor vehicle law

statutory interpretation

traffic infractions

limited liability companies

QUESTIONS PRESENTED

1. Whether a person may be adjudicated responsible under 29-A M.R.S. § 514 for evading Maine registration fees and excise taxes when the vehicle was owned and registered by an out-of-state limited liability company and the person was not shown to be the vehicle's owner.
2. Whether the vehicle's Montana registration and Maine's reciprocity statute relieved the out-of-state owner from Maine's registration requirement.
3. Whether McCoy could instead be liable for operating an unregistered vehicle under 29-A M.R.S. § 351(1) when he was charged only under section 514.

HOLDINGS

1. A person can violate 29-A M.R.S. § 514 only if that person is required to register the vehicle in Maine. Under 29-A M.R.S. §§ 101(50) and 351, the registration responsibility falls on the vehicle's owner, defined as the title holder or a person with the exclusive right to use the vehicle for at least thirty days. Because the evidence did not establish that McCoy met either definition, he could not be adjudicated responsible under section 514.
2. The evidence indicated that the pickup's out-of-state registration conformed to Maine's reciprocity law and relieved the LLC, as the nonresident owner, from having to register the vehicle in Maine.
3. McCoy's possible liability for operating an unregistered vehicle under 29-A M.R.S. § 351(1) could not sustain the judgment because he was charged only with evading registration fees and excise taxes under section 514, and the evidence showed that the pickup was registered in Montana.

KEY QUOTATIONS

“Thus, by the plain terms of this statute, a person can commit this infraction only if, among other things, that person is the one who is required to register the vehicle in Maine.” (¶ 8)

“For the case immediately before us, we conclude that because McCoy was not required to register the pickup truck, he cannot have committed a violation of section 514.” (¶ 17)

FACTUAL BACKGROUND

A Maine resident, Brandon Oakley McCoy, was stopped while driving a pickup truck registered in Montana to Brandon McCoy, LLC, a Montana entity. The State charged McCoy individually with evading Maine registration fees and excise taxes under 29-A M.R.S. § 514. The evidence showed that the LLC was active and that the pickup was registered to it, but there was no evidence that McCoy held title or had the exclusive right to use the pickup for at least thirty days.

PROCEDURAL HISTORY

McCoy contested a summons issued after a traffic stop. Following an adjudicatory hearing, the District Court adjudicated him responsible for violating 29-A M.R.S. § 514 and imposed a \$500 fine. The Supreme Judicial Court of Maine vacated the judgment and remanded for entry of judgment for McCoy.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Remanded for entry of judgment for the defendant, Brandon Oakley McCoy.

CASES CITED

- State v. Palmer, 2017 ME 183, 169 A.3d 425
- State v. Ray, 2025 ME 29, 334 A.3d 663
- Wuori v. Otis, 2020 ME 27, 226 A.3d 771
- State v. Chase, 2017 ME 43, 157 A.3d 1291
- Hannum v. Board of Environmental Protection, 2003 ME 123, 832 A.2d 765
- Rangeley Crossroads Coalition v. Land Use Regulation Commission, 2008 ME 115, 955 A.2d 223
- State v. Weinschenk, 2005 ME 28, 868 A.2d 200